

July 7, 2003

Commissioners,

I urge you to reject any changes to Part 15 for the purpose of allowing a large scale deployment of BPL services.

As both a professional engineer and licensed Amateur Radio operator (KB9RXE) I suggest that more study is needed (or be made available) to understand how other services will be impacted by large scale BPL deployments. Given the data already available from field trials in both Europe and Japan, it seems that we are trading the problem of limited high speed Internet access for one that is far worse, namely, interference to a large number of existing services. While some of these services are hobby oriented (e.g., amateur radio), many more are not, and the consequences of interference in the form of increased noise level will have very serious effects (life and death in some cases!).

Basic engineering best practices demand that known problems be addressed in a design versus trying to fix the issue once the design is in production. My contention is that BPL suffers from a number of design issues and the time to address them is now and not later.

Good engineering would also suggest that not only a comprehensive overview document be made available for review and comment but also one that outlines expected impact to existing services. It seems a reasonable thing to make this information available to all so we can potential impacts and avoid an expensive and painful process later.

Please reject any BPL inspired changes to Part 15.

Thank you for your consideration.

Neal Thomison